



1313 North Market Street  
P.O. Box 951  
Wilmington, DE 19801-0951  
302 984 6000  
[www.potteranderson.com](http://www.potteranderson.com)

David E. Moore  
Partner  
Attorney at Law  
[dmoore@potteranderson.com](mailto:dmoore@potteranderson.com)  
302 984-6147 Direct Phone  
302 658-1192 Firm Fax

June 27, 2022

**VIA ELECTRONIC FILING**

The Honorable Stephanos Bibas  
James A. Byrne United States Courthouse  
601 Market Street  
Philadelphia, PA 19106

Re: *Thomson Reuters Enterprise Centre GmbH et al. v. ROSS Intelligence Inc.*,  
C.A. No. 20-613-SB

Dear Judge Bibas:

The parties in the above-referenced matter write to request a briefing schedule and discovery teleconference.<sup>1</sup>

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on June 24, 2022.

Delaware Counsel for Plaintiffs: Michael Flynn

Lead Counsel for Plaintiffs: Joshua Simmons & Eric Loverro

Delaware Counsel for Defendant: Brandon Harper

Lead Counsel for Defendant: Warrington S. Parker III, Joachim B. Steinberg, & Anna Z. Saber

The dispute requiring judicial attention is as follows:

- ROSS RFP Nos. 67 and 68 (Plaintiffs' source code);
- ROSS RFP Nos. 87 and 88 (Plaintiffs' licensing strategy documents); and
- ROSS RFP Nos. 100-102, 123-126, and 141 (documents showing the financial value of Westlaw content)

---

<sup>1</sup> The parties have a prior request for a briefing schedule and discovery teleconference pending. See D.I. 161.

The Honorable Stephanos Bibas

June 27, 2022

Page 2

Respectfully,

*/s/ David E. Moore*

David E. Moore

DEM:nmt/10205585/50241

cc: Counsel of record (via electronic mail)